

The \$350,000 for Rush Creek design and delta removal presents several problems, and should be eliminated from the budget.

- It attempts to solve a problem by dealing with its symptom rather than its cause. The basic cause is decimation of the Rush Creek watershed. The watershed needs to be rehabilitated
- The EIS/EIR and Record of Decision have no provision for dredging/removing tributary deltas. They do contain provisions requiring watershed rehabilitation
- There appears to be no rationale offered, of which I'm aware, to abandon watershed rehabilitation as contained in the ROD in favor of instream activities that are not included in the ROD
- It abandons the successful Grass Valley Creek approach which was to deal with source control as well as to use flushing processes
- It is unknown how the action will affect the form and function of the river downstream of the project. It is possible, but not knowable, that the material simply may move downstream and merely shift the location of the problem. This is because the basic cause of the problem is not being addressed
- Given the as yet unproven full capability of flows to move sediment (all based only upon modeling, not actual trial or experience), control of sources of material entering the mainstem become the principal targets of opportunity. This is true even assuming the river at some time will receive flows (a return of water to the river) as set forth in the ROD
- The project appears to be a transitory solution to a permanent problem that would require constant maintenance, not allowed under Federal Antideficiency Act.
- Since Coho are supported in the channel upstream and downstream of the project, very extensive analysis of biological impacts will be required, particularly given the listed status of this species. The project would have a significant impact/affect upon the biological and physical environment
- What is needed in place of the proposed project at this time, given the time and exhaustive study required even to initiate it and to include it in this budget, is a thorough analysis of alternatives that would provide a comprehensive solution to the Rush Creek Delta problem.